

# **EXHIBIT 81**

## **CONFIDENTIAL**

In accordance with a protective order, the enclosure(s) shall be treated as confidential and shall not be shown to any person other than those persons designated in paragraph 8.2 of the paragraph order.

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\* Admitted only to a bar other than that of the District of Columbia. Working under the supervision of principals of the Washington office.

\*\* Special Legal Consultant, qualified in the People's Republic of China.

**CONFIDENTIAL TREATMENT REQUESTED**

August 5, 2021

Federal Reserve Bank of Kansas City  
1 Memorial Drive  
Kansas City, Mo. 64198

Attn: Ms. Esther George  
President and Chief Executive Officer, Federal Reserve Bank of Kansas City

Re: Application by Avanti Financial Group, Inc. (d/b/a Avanti Bank & Trust) for Federal Reserve Membership.

Ladies and Gentlemen:

On behalf of our client Avanti Financial Group, Inc. (d/b/a Avanti Bank & Trust) (“Avanti”), a Special Purpose Depository Institution chartered in Wyoming, please find attached Avanti’s application (the “Application”) to the Federal Reserve Bank of Kansas City (the “FRBKC”) to become a member of the Federal Reserve System. Avanti already has received Wyoming approval of its charter, and Avanti is not planning on applying for insurance with the Federal Deposit Insurance Corporation. The information contained in the Interagency Charter and Federal Deposit Insurance Application is provided in support of the Federal Reserve Membership Application.

Avanti requests confidential treatment for the Confidential Version of this Application, the Confidential Exhibits thereto and the enclosed Interagency Biographical and Financial Reports (together, the “Confidential Information”), including pursuant to the Freedom

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of Information Act, 5 U.S.C. §§ 552(b)(4), (b)(6) and (b)(8), and the implementing regulations of the Board of Governors of the Federal Reserve System (the “Federal Reserve Board”) thereunder. The Confidential Information includes privileged and confidential commercial and financial information, proprietary in nature, that is not available to the public from any other source. Disclosure of this information to the public, including competitors of Avanti, would provide such competitors and others with information about the confidential financial and business plans, prospects, profitability, and operations of Avanti. From this information, competitors could make inferences about operations and competitive strategies that could potentially result in altering the competitors’ own competitive strategies and relationships to the detriment of Avanti. Certain information in the Application also includes confidential supervisory information and personal financial information with respect to private individuals, the public disclosure of which would constitute a clearly unwarranted invasion of personal privacy. Avanti further requests that if, notwithstanding the foregoing, the FRBKC or the Federal Reserve Board should determine preliminarily to make available to the public any of the information contained in the Application or its exhibits, it will inform Avanti prior to doing so in order that we may discuss the matter further.

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If you have any questions or we can provide any further information regarding the Application, please do not hesitate to contact me (tel. no. (202) 974-1526; dbush@cgsh.com) or Chuck Thompson, General Counsel of Avanti (chuck@avantibank.com).

Very truly yours,

A handwritten signature in black ink, appearing to read 'DBush', written over a horizontal line.

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Derek M. Bush

cc: Ms. Tara Humston  
Ms. Christi May-Oder  
Ms. Jackie Nugent  
Federal Reserve Bank of Kansas City

Caitlin Long, Esq.  
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